

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

William Ray FERRY

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Javier Medrano

Complainant's signature

Javier Medrano, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: October 21, 2021

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

William Ray FERRY

Case Number:

1. On October 19, 2021 at approximately 6:20 p.m., a Border Patrol Agent (BPA) working the Laredo North Checkpoint located at the 29 mile marker of IH-35 near Laredo, Texas in Webb County, encountered a white semi-tractor towing a white trailer to be inspected. The BPA observed the driver, later identified as William Ray Ferry, and asked him if he was a United States Citizen (USC) and he replied "Yes." At that time, the BPA heard an audible alarm generated from the License Plate Reader (LPR). The BPA saw that the alarm was triggered by an alert on the tractor license plate for possible narcotics, currency and/or alien smuggling. The BPA requested a BPA canine handler to his lane and informed the BPA canine handler of the alert. The BPA canine handler conducted a free air sniff of the tractor and told the inspecting BPA that his service canine had alerted to possible narcotics and/or concealed persons inside the tractor. The BPA referred the tractor trailer to secondary for further inspection.
2. At secondary, BPAs requested Ferry to exit the tractor and the BPA canine handler conducted a second free air sniff with his service canine. The service canine alerted to the storage compartment area of the tractor. The BPA canine handler entered the tractor and discovered two subjects behind the driver seat. The BPA canine handler lifted the bed and discovered a third subject concealed by the mattress. An immigration inspection was conducted on all three subjects and it was determined they were illegally present in the United States. All subjects were placed under arrest and escorted into the checkpoint for further investigation.
3. **PRINCIPAL STATEMENT:** William Ray Ferry, a United States Citizen, was provided his Miranda Rights and acknowledged he understood them by signing service for I-214. William Ray Ferry chose to invoke his right to remain silent. At that time all questioning ceased.
4. **MATERIAL WITNESS STATEMENT:** Rafael Valverde-Carmona, is a Mexican national who admitted being in the United States illegally and is serving as a material witness in the alien smuggling case against William Ray Ferry. Valverde-Carmona was able to positively identify William Ray Ferry as the driver of the semi-tractor in a six person photo lineup. Valverde-Carmona stated his family made arrangements for him to be smuggled into the United States for an unknown amount to his final destination of Dallas, Texas. On October 17, 2021, Valverde-Carmona illegally crossed the Rio Grande River from Mexico to the United States near Laredo, Texas. Upon arrival to the United States, he walked for approximately fifteen minutes before being picked up by a van by an unknown man who took him to a house. Valverde-Carmona stayed at the house until October 19, 2021 when he was picked up by an unknown man in a vehicle and was blindfolded. The unknown man told him to remove the blindfold and enter the tractor trailer parked nearby. Valverde-Carmona exited the vehicle and observed a man, William Ray Ferry, inspecting the tires. Valverde-Carmona stated Ferry hand signaled for Valverde-Carmona and the other subjects to enter the tractor. Once inside, Ferry told one of the subjects to get under the bed. Ferry told the other two subjects to hide behind the driver seat and concealed them with clothes. Ferry instructed all three subjects to remain quiet by using hand signals. Valverde-Carmona stated Ferry knew he and the other subjects were illegally present in the United States.

SUBSCRIBED and SWORN to before me on

21st

day of

October, 2021

Signature of Judicial Officer

/S/ Medrano, Javier Border Patrol Agent

Signature of Complainant